

**Response of
Wisconsin Power and Light Company
to
The Public Service Commission of Wisconsin
Data Request No. 1.22**

Docket Number: 05-CE-137
Date of Request: January 29, 2009
Information Requested By: Ken Detmer
Date Responded: February 16, 2009
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Witness: (If other than Author)

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Describe how the fleet-wide plan addresses SO₂ emissions for the WP&L fleet.

Note:

While this project is part of WPL's fleet-wide air emissions control plan, WPL can only comply with RACT by reducing NO_x emissions at the Edgewater facility.

Response:

A long-term goal (by 2015) of the WPL emissions control plan is to reduce WPL fleet-wide SO₂ emissions to an annual level that is at or below the annual amount of SO₂ emission allowances allocated to WPL under the Clean Air Interstate Rule (CAIR) as currently written. WPL accomplishes this by planning to install scrubbers at units that are significant contributors to WPL's fleet-wide SO₂ emissions. WPL uses other sources of SO₂ emission allowances including banked and purchased allowances in addition to the annual amount of allowances allocated to it to meet its CAIR compliance requirements until it meets this long-term goal.

In addition, WPL considers compliance requirements of other rules as well when choosing the location and timing of scrubber installations. By acknowledging the presence or potential presence of other rules, WPL attempts to increase the synergies of these projects. Other rules that WPL considers include those that require SO₂ emission reductions at specific locations by specific dates such as the Best Available Retrofit Technology (BART) rule (see 05-CE-137 Data Request No. 01.21 for further information re: BART) as well as rules requiring reductions of mercury emissions.